



DEPARTMENT OF HEALTH AND ENVIRONMENT

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May 7, 1987

RCOM SECTION

CERTIFIED LETTER NO. P 275 763 984

Mr. William E. Dame
Olin Water Services
3155 Fiberglass Road
Kansas City, Kansas 66115

Re: Hazardous Waste Compliance Inspection
EPA Identification Number KSD000203638

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MANAGEMENT

Dear Mr. Dame:

On April 20, 1987, Mr. John Bosky, USEPA, Ms. Janel Rogers and I, conducted an inspection of your facility to determine compliance with state and federal regulations concerning hazardous waste.

A review of our files revealed that Olin Water Services-Olin Corporation generates hazardous waste from the preparation of liquid and powder water treatment formulations. These wastes are identified by the following waste codes:

- D001 Solid waste which exhibits the characteristics of Ignitability
- D002 Solid waste which exhibits the characteristics of Corrosivity
- D003 Solid waste which exhibits the characteristics of Reactivity
- D007 Solid waste that exhibits the characteristics of EP Toxicity for chromium
- F001 Methylene Chloride which exhibits the characteristics of being toxic
- Various U-Listed chemicals.

In addition to being a generator, Olin Water Services has a hazardous waste storage permit. Your facility is, therefore, subject to the requirements of 40 CFR, Parts 260 to 264, 270, and 124 and the specific conditions of Permit Number KSD000203638.

The inspection identified the following items not in compliance with state and federal regulations concerning generators of hazardous waste and the permit requirements for your storage facility.

General Facility Standards

1. Personnel Training: The owner or operator must maintain the following documents and records at the facility: Records that document that the training or job experience required under paragraphs (a), (b), and (c) of this section has been given to, and completed by, facility personnel (40 CFR 264.16(d)(4)f).

- A. On the date of the inspection you were unable to provide training records for Mr. Richard Call, who is designated as an emergency coordinator. You indicated Mr. Call's training records are maintained at your corporate offices.

Training records for all handlers of hazardous waste and emergency coordinators must be maintained at the facility and available for inspection.

2. General Inspection Requirements: The owner or operator must record inspections in an inspection log or summary. At a minimum, these records must include the date and time of the inspection, and name of the inspector. (40 CFR 264.15(d))

A review of your inspection logs revealed that during the months of October, November, and December 1986, the name of the inspector was initially signed, but subsequent inspection dates were signed off with a check mark rather than a signature as required.

Marking Requirements

3. Accumulation Time: An operator of a hazardous waste container storage facility shall mark all containers in accordance with K.A.R. 28-31-4(g)(2) and F(3). (K.A.R. 28-31-8(b))

On the date of the inspection four (4) drums displaying the company name Buckman - D001 contents, did not display the accumulation start date as required.

Use and Management of Containers

4. Condition of Containers: If a container holding hazardous waste is not in good condition, or if it begins to leak, the owner or operator must transfer the hazardous waste from this container to a container that is in good condition, or manage the waste in some way that complies with the requirements of this part (40 CFR 265.171).

- A. On the date of the inspection one (1) drum identified as containing D001 - Ignitable Waste was dented.

Action should be taken to transfer the contents of this drum into a suitable container.

Financial Requirements

5. Cost Estimate for Closure: The owner or operator must keep the following documents at the facility during the operating life of the facility. The latest closure cost estimate prepared in accordance with 264.142(a) and

latest closure cost estimate prepared in accordance with 264.142(a) and (c) and, when this estimate has been adjusted in accordance with 264.142(b), the latest adjusted closure cost estimate (40 CFR 264.142(d)).

- A. On the date of the inspection you could not provide the latest closure cost estimate. According to information provided, this information was maintained at your corporate offices.

You must maintain a copy of the latest closure cost estimate at the facility.

Permit Requirements

6. In the "Facility Description" portion of your Part B, you indicate that ignitable and reactive wastes will be stored no more than two (2) pallets in height. On the date of the inspection pallets of ignitable and reactive wastes were stacked three (3) pallets high which is in violation of the conditions of permit number KSD000203638.

Please take action to correct these deficiencies by June 15, 1987. Please notify our department in writing when corrected and please identify the corrective action(s) for each deficiency noted.

During the inspection we discussed the out of date materials (laboratory reagents, etc.) you are storing in safety buckets. As discussed, these materials have the potential of being classified as hazardous waste and their disposal regulated by state and federal regulations. You indicated that you are in the process of doing an inventory in the laboratory for out of date chemicals and that in the near future you will take action to dispose of the materials stored in the safety buckets and whatever out of date laboratory chemicals you discover. Please notify our department in writing when accomplished and please provide supportive documentation (inventory list, manifests, etc.).

During the inspection and during subsequent telephone conversations with Mr. Larry Prouty and Dr. Cayce Warf, we discussed the use and disposal method for the methylene chloride, which is used in the laboratory to clean lab ware. The resulting waste is placed in a satellite collection container which, when full, is taken to the hazardous waste storage area and the contents dumped into drums containing characteristic wastes. Based on information provided, these waste drums are incorrectly labeled as D001 because if a generator mixes an F-listed waste with a characteristic hazardous waste, the resulting mixture is also a listed hazardous waste. Therefore, all drums containing waste methylene chloride must be identified and relabeled as F001. An F001 waste is not identified in your permit for storage over 90 days, therefore, all drums currently in the drum storage area containing methylene chloride must be transported off site within 90 days of the receipt of this letter. Unless the permit is modified, all future methylene chloride waste must be transported off site within 90 days of placing the drums containing methylene chloride in the hazardous waste storage area. Please advise our department, in writing, of your progress in correcting this deficiency by June 15, 1987.

Olin Water Services

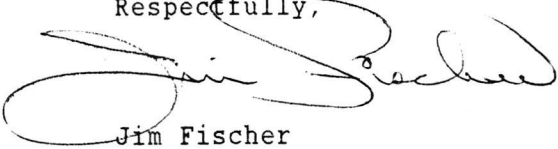
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I have enclosed a copy of an overview of the new regulatory requirements concerning F-listed wastes. You must resubmit a Hazardous Waste Notification Form (form 8700-12) notifying the department that you handle F-listed solvent wastes. You also must prepare documentation to accompany the F-listed waste when it is transported off site in accordance with 40 CFR 268.7. Please submit the notification form by June 15, 1987.

Your cooperation with the hazardous waste management program is appreciated. If you have questions concerning the inspection, please call me at 913/842-4600, or contact Ms. Janel Rogers at 913/862-9360, extension 532.

Respectfully,



Jim Fischer
Inspections and Enforcement Section
Bureau of Waste Management
Northeast District

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c: Tom Gross
J. P. Goetz
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